

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

LINDA WILLIAMS,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO. 1:06CV598-WKW
)	
ENTERPRISE CITY SCHOOL DISTRICT,)	
)	
Defendant.)	

REPORT OF PARTIES' PLANNING MEETING

COME NOW the parties, jointly through their counsel and, give the following report of their planning meeting:

1. Pursuant to Fed.R.Civ.P. 26 (f), a meeting was held on May 7, 2007, by telephone conference, and was attended by counsel for the Plaintiff, Vic Price and counsel for the Defendant R. Rainer Cotter, III.

1. Pre-discovery Disclosures. The parties will exchange by 30 days from entry of the Court's scheduling order, the information required by Fed.R.Civ.P. 26(a)(1).

3. Discovery Plan. The parties propose to the Court the following discovery plan:

a. Discovery will be needed on the following subjects: Plaintiff's claims through deposition of the Plaintiff, Defendant, and other witnesses named by the Plaintiff or Defendant. Discovery will be both as to questions of liability and as to any damages.

b. All discovery should be commenced in time to be completed by the time of the pretrial conference.

c. A maximum of thirty (30) interrogatories by each party to any other party shall be allowed.

d. A maximum of thirty (30) requests for production by each party to any other party shall be allowed.

e. A maximum of thirty (30) requests for admission by each party to any other party shall be allowed.

f. A maximum of ten (10) depositions by Plaintiff and ten (10) depositions by Defendant. Each deposition shall be limited to a maximum of six (6) hours unless extended by agreement of parties or for good cause.

g. Reports from retained experts under Rule 26(a)(2) due: From Plaintiff by August 15, 2007. From Defendant by September, 15, 2007.

h. Supplementations under Rule 26(e) due on or before the date of the pretrial conference.

4. Other Items. The parties do not request a conference with the Court before entry of a Scheduling Order.

a. The parties request a pretrial conference in January, 2008.

b. Plaintiff may be allowed until June 10, 2007 to join additional parties or to amend the pleadings.

c. Defendant may be allowed until July 30, 2007 to join additional parties or to amend the pleadings.

d. All potentially dispositive motions should be filed by ninety (90) days prior to the date of the pretrial hearing.

e. As no discovery has taken place in this matter, settlement cannot be evaluated at this time.

f. Final lists of witnesses under Rule 26(a)(3) are due from the parties on or before one (1) week before the pretrial conference.

g. Parties should have until seven (7) days after service of final lists of witnesses to file objections to any witnesses or exhibits pursuant to Rule 26(a)(3).

h. Parties shall have serve final lists of exhibits under Rule 26(a)(3) fifteen (15) days prior to trial date. Parties shall have seven (7) days after service of final lists of exhibits to file objections.

i. On or before one (1) week before the pretrial conference, the parties shall designate, pursuant to Rule 26(a)(3), any part of a deposition or other document that a party expects to use at trial. Adverse parties shall within one (1) week thereafter identify any responsive parts of depositions expected to be used and a party shall within three (3) days of the designation of such responsive parts designate any part which is desire as a rebuttal thereto.

j. The case should be ready for trial during the non-jury civil term set for _____, Alabama, for February 25, 2008.¹ The case is expected to take approximately two (2) days for trial based on present knowledge.

Counsel for the Plaintiff

/s/ J. Victor Price

J. VICTOR PRICE

17 Sistrunk Street

Tallasse, Alabama 36078

Counsel for Defendant

¹According to the Court's website, the assigned Judge does not appear to have a non-jury term scheduled in Dothan. Therefore, in consultation with the Court's judicial law clerk, the parties have not inserted either Dothan or Montgomery.

/s/ R. Rainer Cotter, III

R. Rainer Cotter, III(ASB#4925-E49R)

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